

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GUCCI AMERICA, INC.,	: Civil Action No. 09cv4373
Plaintiff,	: (SAS)(JLC)
: - against - : :	
GUESS?, INC., MARC FISHER FOOTWEAR	: :
LLC, THE MAX LEATHER GROUP/CIPRIANI	: :
ACCESSORIES, INC., SEQUEL AG, K&M	: :
ASSOCIATES L.P., VIVA OPTIQUE, INC.,	: :
SIGNAL PRODUCTS, INC. and SWANK, INC.,	: :
Defendants.	: :
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**NOTICE OF MOTION PURSUANT TO FEDERAL RULE 26(c) FOR
A PROTECTIVE ORDER AGAINST THE DISCLOSURE OF THE PRIVILEGED
COMMUNICATIONS OF NON-PARTY GUCCIO GUCCI S.P.A.'S IN-HOUSE
INTELLECTUAL PROPERTY COUNSEL VANNI VOLPI**

PLEASE TAKE NOTICE that Plaintiff Gucci America, Inc. hereby moves, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, before the Honorable James L. Cott, United States Magistrate Judge, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, and in accordance with the briefing schedule established by the Court, for a protective order against the disclosure of the privileged communications of non-party Guccio Gucci S.p.A.'s in-house Intellectual Property Counsel Vanni Volpi.

PLEASE TAKE FURTHER NOTICE that in support of said motion, Plaintiff will rely upon the following materials submitted herewith:

- 1) Declarations of Vanni Volpi, Daniela Della Rosa, Esq., Cheryl Solomon, Esq., Fausto Pocar, and Louis S. Ederer, Esq., and all exhibits annexed thereto; and
- 2) Memorandum of Law In Support of Plaintiff Gucci America, Inc.'s Motion for a Protective Order Against the Disclosure of the Privileged Communications of Non-Party Guccio Gucci S.p.A.'s In-House Intellectual Property Counsel Vanni Volpi Moss.

Dated: New York, New York
April 2, 2010

Respectfully submitted,

ARNOLD & PORTER LLP

By:



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